

MARGARET M. SHALLEY, ESQ.

MARGARET M. SHALLEY & ASSOCIATES, LLC

225 Broadway, Suite 715

New York, NY 10007

917-841-0231 (Phone)

212-566-8165 (Fax)

margaretshalley@aol.com

October 12, 2021

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: *U.S. v. Brajan Tola*
20 CR 660 (RA)**

Dear Judge Abrams:

I am the attorney for Brajan Tola in the above-referenced matter. On December 10, 2020, Mr. Tola was released on a \$100,000 personal recognizance bond co-signed by 3 financially responsible persons with travel restricted to the Southern and Eastern Districts of New York. On February 12, 2021, Mr. Tola's bond conditions were modified to include travel to New Jersey. The purpose of this letter is to respectfully request that Mr. Tola's bond conditions be modified to include travel to Pennsylvania and Massachusetts for work purposes. Both the Government and Pretrial Services consent to this request. Accordingly, it is respectfully requested that Mr. Tola's bond conditions be modified to include travel to Pennsylvania and Massachusetts for work purposes. The Court's time and consideration of this matter are greatly appreciated.

Respectfully submitted,

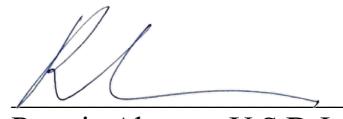
/s/

Margaret M. Shalley

cc: The Honorable Sarah Netburn (*via ECF*)
All Counsel (*via ECF*)
USPSO Dayshawn Bostic (*via email*)

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
October 13, 2021